

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
EASTERN (WATERLOO) DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JOSEPH LONGANGA OKOKO,
JOSEPH ONOLENGA OKAMBA,
MEDARD LOTAHE ELONGE, and
BIENVENU SAIDO BINYANGI,

Defendants.

)
) No. 24-CR-02052
)
) Count 1: 18 U.S.C. § 371
) Conspiracy to Defraud the United States
) JOSEPH LONGANGA OKOKO,
) JOSEPH ONOLENGA OKAMBA,
) MEDARD LOTAHE ELONGE, and
) BIENVENU SAIDO BINYANGI
)
) Count 2: 18 U.S.C. § 1001
) False Statement
) JOSEPH LONGANGA OKOKO
)
) Count 3: 18 U.S.C. § 1546(a)
) Visa Fraud
) BIENVENU SAIDO BINYANGI
)
) Count 4: 18 U.S.C. §§ 2, 1546(a)
) Aiding and Abetting Visa Fraud
) JOSEPH ONOLENGA OKAMBA
)
) Count 5: 18 U.S.C. § 1001
) False Statement
) JOSEPH ONOLENGA OKAMBA
)
) Count 6: 8 U.S.C. § 1325(c), 18 U.S.C. § 2
) Aiding and Abetting Marriage Fraud
) JOSEPH ONOLENGA OKAMBA,
) MEDARD LOTAHE ELONGE
)
) Count 7: 8 U.S.C. § 1325(c), 18 U.S.C. § 2
) Aiding and Abetting Marriage Fraud
) JOSEPH ONOLENGA OKAMBA
)
) Count 8: 18 U.S.C. § 1503
) Obstruction of Justice
) JOSEPH ONOLENGA OKAMBA,
) MEDARD LOTAHE ELONGE
)

) Count 9: 18 U.S.C. § 1546a)
) Visa Fraud
) MEDARD LOTAHE ELONGE
)
) Count 10: 8 U.S.C. § 1325(c), 18 U.S.C. § 2
) Aiding and Abetting Marriage Fraud
) JOSEPH LONGANGA OKOKO

INDICTMENT

The Grand Jury charges:

At all times relevant to this indictment:

1. JOSEPH LONGANGA OKOKO, JOSEPH ONOLENGA OKAMBA, MEDARD LOTAHE ELONGE, BIENVENU SAIDO BINYANGI, and others known and unknown to the grand jury, were at one time citizens of the Democratic Republic of the Congo (“DRC”). DRC is a country located in Africa and is bordered to the southwest by Angola. While the official language of DRC is French, some people who reside in the DRC, the Congolese population, also utilize a number of African languages, including Lingala.

2. In or around October 2008, JOSEPH ONOLENGA OKAMBA entered the United States. JOSEPH ONOLENGA OKAMBA is married to NYO, JOSEPH LONGANGA OKOKO’s niece.

3. In or about June 2013, JOSEPH LONGANGA OKOKO entered the United States. Since in or around July 2013, JOSEPH LONGANGA OKOKO used a Gmail email account.

4. In or about January 2022, MEDARD LOTAHE ELONGE entered the United States. MEDARD LOTAHE ELONGE is a friend of JOSEPH ONOLENGA OKAMBA.

5. In or about February 2023, BIENVENU SAIDO BINYANGI entered the United States. BIENVENU SAIDO BINYANGI is married to MLLO, one of the daughters of JOSEPH LONGANGA OKOKO.

Visas and Petition to the United States

6. The United States Department of Homeland Security, and components within to include: Immigration and Customs Enforcement and Citizenship and Immigration Services are agencies of the United States government. Department of Homeland Security lawful governmental functions include, among other things, the entry into the United States and the granting and administration of immigration benefits (including those pursuant to I-130s, I-485s, I-589s, and N-400s).

7. The U.S. Department of State (DOS) is an agency of the United States government. The Department of State's lawful governmental functions include, among other things, the administration, regulation, and enforcement of the regulations and laws related to the issuance of visas and the lawful entry into the United States through visa programs.

8. A visa issued by DOS identifies the holder of the visa as a citizen of a foreign country who has lawful permission to enter the United States for a specific purpose and a specific period.

9. There are various means by which foreign citizens can obtain visas to enter the United States. Some visas are temporary, such as, student visas or employment visas. If a foreign citizen obtains one of these types of visas, the expectation is that they will visit the United States for a set amount of time and return to their country. Foreign citizens may be able to obtain other types of visas in order to enter the United States and remain in the United States permanently, as a “permanent resident,” and eventually to obtain citizenship. Foreign citizens may also petition for asylum.

Diversity Visa Program Process

10. The Diversity Visa (DV) program is intended to provide an immigration opportunity for persons from countries which are underrepresented in the United States. The DV program is used in the DRC. In order to start the visa process, a Congolese applicant must first enter the DV lottery and win a spot to be eligible to enter the United States. To enter the lottery the applicant must submit an entry. When an applicant enters the lottery, they receive a confirmation number which controls their entry. Each year the DOS allocates a limited number of positions for DV lottery winners.

11. In order to enter the United States, the lottery winners must first apply for a visa. To do so, the lottery winner submits an Online Diversity Visa Application (DS-260) to the DOS via the Consular Electronic Application Center (CEAC) website. In the Democratic Republic of the Congo (DRC), personal/home internet access is uncommon.

12. It is common for many Congolese internet cafes to assist people to enter the DV lottery as many entrants lack computer literacy, English language ability, and have limited internet connectivity.

13. Entry into the United States can be costly and many DV lottery winners cannot afford to come to the United States without financial assistance. Given the unlikelihood of most DV lottery winners being able to personally finance a trip to the United States, it is common for other individuals to offer to assist DV lottery winners with financing the trip to the United States. While these people offer financial assistance, they generally expect repayment by the DV lottery winner once the DV lottery winner is in the United States.

14. U.S. consular officers assigned to U.S. Embassies and Consulates are responsible for adjudicating U.S. visa applications. In order to approve a DV, a consular officer has to be convinced of the applicant's legal eligibility.

15. Prior to departure to the United States, a beneficiary, must complete a DV packet. The DV packet contains the beneficiary's passport and visa, includes a medical report, and copies of a high school diploma, birth certificate, a police certificate stating no criminal history, a marriage certificate (if married), and an affidavit of support (if required).

16. Once a DV lottery winner obtains a visa, arrives in the United States, and obtains some form of lawful status, certain benefits are conveyed on the individual by the United States government. One such benefit of receiving a diversity visa, besides immediate eligibility to enter the United States as an

immigrant and receive permanent resident status in the United States, is the ability to petition pursuant to the I-130 for other family members, such as spouses, (under the family reunification visa categories) to obtain visas to join the DV lottery winner in the United States. The petition to obtain United States visas for immediate family members of DV lottery winners is called an I-130.

Fraud and Coupling in the Visa Process

17. There are various types of fraud that may occur when a foreign citizen obtains a visa and enters the United States. For example, if a foreign citizen obtains a visa to enter the United States as a student or for a visit but intends to stay in the United States permanently, an application indicating only an intention to remain in the United States while engaged in an educational program may be fraudulent. Similarly, if a foreign citizen in the United States files an asylum petition based on untruthful information in order to remain in the United States, there may be fraud.

18. There are various types of fraud that may occur in relationship to the DV process. When a DV winner enters the United States, he/she may eventually be able to petition for family members, including a spouse, to join them in the United States (family reunification) via an I-130 petition. If a DV winner was not married or their paperwork was silent as to a spouse at the time they won the DV lottery, they may be encouraged to engage in "coupling." "Coupling" involves the DV winner falsely claiming that they have a spouse, so that they can later petition to bring their "spouse" to the United States. Because many DV winners may rely on others

to pay/sponsor their trip to the United States, DV winners are also susceptible to requests for “coupling” in order to have their trips sponsored to the United States.

Count 1
(Conspiracy to Defraud the United States)

19. Paragraphs 1 through 18 are incorporated here.

20. From in or about 2013 through or about the present, in the Northern District of Iowa and elsewhere, defendants JOSEPH LONGANGA OKOKO, JOSEPH ONOLENGA OKAMBA, MEDARD LOTAHE ELONGE, and BIENVENU SAIDO BINYANGI, did unlawfully, voluntarily, intentionally, and knowingly conspire, combine, confederate, and agree with others known and unknown to the Grand Jury, to defraud the United States by impeding, impairing, obstructing, and defeating the lawful government functions of the Department of State, and Department of Homeland Security in the following ways: (1) entry into the United States, (2) granting and administration of immigration benefits, (3) implementing and enforcing lawful immigration in the United States and elsewhere, and (4) the administration and granting of visas.

Object of the Conspiracy

21. It was an object of the conspiracy to fraudulently obtain visas for citizens of the DRC so that people from the DRC could illegally enter the United States.

22. One of the objects of the conspiracy was to obtain visas and ultimately permanent resident status and citizenship for family or friends of defendants and defendants’ relatives who were not otherwise eligible for such status or citizenship.

23. Another object of the conspiracy was to obtains funds from potential DRC visa recipients to pay for other expenses needed to obtain entry into the United States for citizens of the DRC.

The Manner and Means of the Conspiracy

24. One means by which defendants furthered an object of the conspiracy to defraud the United States was filing I-130 and I-130A petitions (petitions for alien relative/spouse beneficiary). Defendants assisted in providing false information in the petitions and supplemental information provided in support of the petitions.

25. One means by which defendants furthered an object of the conspiracy to defraud the United States was by assisting DV winners in “coupling” or false marriages, knowing that the purported marriages were fraudulent.

26. One means by which defendants furthered an object of the conspiracy to defraud the United States was requiring DV winners to repay the costs expended to come to the United States at interest rates of one hundred to three hundred percent of costs. Defendants typically entered into “debt contracts” with the DV winners establishing the method of repayment to be made in the United States for defendants’ payments of the DV winners travel to the United States shortly before they traveled to the United States in the Congo. Some of these debt contracts were later enforced against the DV winners through the Iowa Courts.

Introduction – BIENVENU SAIDO BINYANGI Fraudulent Visa Petitions

27. On or about June 2013, JOSEPH LONGANGA OKOKO entered the United States on a visa. On or about October 2013, JOSEPH LONGANGA OKOKO filed an I-589 application. On or about January 2018, JOSEPH LONGANGA OKOKO petitioned for MLLO, his biological daughter, and listed MLLO as unmarried child. In or about May 2019, MLLO married BIENVENU SAIDO BINYANGI in the DRC. In or about September 2019, MLLO entered the United States. On or about January 20, 2020, MLLO gave birth to defendant BIENVENU SAIDO BINYANGI's daughter. On or about April 18, 2021, MLLO filed a I-485 petition for an adjustment of status, listing herself as single and never married. On or about February 26, 2023, defendant BIENVENU SAIDO BINYANGI entered the United States, on a visa.

Overt Acts –BIENVENU SAIDO BINYANGI

28. In furtherance of the conspiracy and to effect its objects, defendant BIENVENU SAIDO BINYANGI committed and caused the commission of the following overt acts in the Northern District of Iowa and elsewhere:

29. After in or about June 2019, defendant BIENVENU SAIDO BINYANGI caused DV entries to be filed after his marriage to MLLO without disclosing his marriage to MLLO.

30. On or about September 23, 2022, defendant BIENVENU SAIDO BINYANGI submitted a DS-160 for a visitor visa fraudulently representing his

marital status as single, failing to disclose a U.S. born child, and his intent to visit the United States.

31. On or about January 23, 2023, defendant BIENVENU SAIDO BINYANGI submitted a DS-160 for a visitor visa fraudulently representing his marital status as single, failing to disclose a U.S. born child, and his intent to visit the United States.

32. On or about April 29, 2023, defendant BIENVENU SAIDO BINYANGI submitted an I-589 Petition fraudulently representing his marital status as single and his basis for his Petition.

Introduction

33. Prior to 2018, JTY, a single male, was selected in the DRC DV lottery. At some time prior to JTY's entry into the United States, JTY and defendants arranged for defendants to pay for JTY's travel to the United States. From about May 2020 through about present, defendant JOSEPH LONGANGA OKOKO, and others known and unknown to the grand jury attempted to arrange a fraudulent civil marriage ceremony between JTY and NBW. The fraudulent marriage would be on behalf of NBW so that an I-130 Petition could be filed for NBW to enter the United States. The marriage would occur in the Congo.

Overt Acts –JOSEPH LONGANGA OKOKO

34. In furtherance of the conspiracy and to effect its objects, defendant JOSEPH LONGANGA OKOKO committed and caused the commission of the following overt acts in the Northern District of Iowa and elsewhere:

35. On July 12, 2021, defendant JOSEPH LONGANGA OKOKO caused a Petition for Alien Relative I-130, to be submitted to USCIS. This Petition represented it was submitted on behalf of JTY to petition for his alleged spouse, NBW.

Introduction – EMN Coupling and Repayment Contract

36. Prior to August 2018, AM and his family, including his minor daughter RM, were selected in the DV lottery. At some time prior to AM and his family's entry into the United States, AM and defendants arranged for defendants to pay for AM and AM's family to travel to the United States. From about before February 2019, through about September 2020, defendants JOSEPH LONGANGA OKOKO and JOSEPH ONOLENGA OKAMBA and others known and unknown to the grand jury attempted to arrange a fraudulent civil marriage ceremony between EMN and AM's daughter RM. The fraudulent marriage would be on behalf of EMN so that an I-130 Petition could be filed for EMN to enter the United States. The marriage would occur in the Congo.

Overt Acts

37. In furtherance of the conspiracy and to effect its objects, defendants JOSEPH LONGANGA OKOKO and JOSEPH ONOLENGA OKAMBA committed and caused the commission of the following overt acts in the Northern District of Iowa and elsewhere:

38. Defendant JOSEPH LONGANGA OKOKO, on about February 2, 2019, entered into an illegal and fraudulent contract with EMN and AM regarding the

payment of \$47,000. In addition, the contract stated: "We agree to give Mr. Jose Okoko Longanga 100% on our annual taxes and we agree to bring Mr. [EMN] here to the USA for family reunification."

39. On about July 12, 2020, defendant JOSEPH LONGANGA OKOKO forwarded this contract on to defendant JOSEPH ONOLENGA OKAMBA.

40. From in or about August 2019, through in or about September 2020, defendant JOSEPH LONGANGA OKOKO collected and received contract payments from AM.

41. From on or about August 2019, through on or about March 2020, defendant JOSEPH LONGANGA OKOKO collected and received contract payments from RM.

Introduction – JM Petition and Contract

42. Prior to June 2017, JM, was selected in the DV lottery. At some time prior to JM's entry into the United States, JM and defendants arranged for defendants to pay for JM and JM's family to travel to the United States. On or about June 1, 2017, Defendant JOSEPH LONGANGA OKOKO and others known and unknown to the grand jury entered into a contract with JM in the amount of \$15,180.

Overt Acts

43. In furtherance of the conspiracy and to effect its objects, defendant JOSEPH LONGANGA OKOKO committed and caused the commission of the following overt acts in the Northern District of Iowa and elsewhere:

44. From August 2017 through about July 2019, Defendant JOSEPH LONGANGA OKOKO collected and received payments on the contract.

Introduction – MM AND JMO Contract

45. Prior to October 2017, MM and his family, were selected in the DV lottery. At some time prior to MM and his family's entry into the United States, MM and defendants arranged for defendants to pay for MM and MM's family to travel to the United States. On or about June 19, 2019, defendant JOSEPH LONGANGA OKOKO and others known and unknown to the grand jury entered into a contract with MM and JMO in the amount of \$34,428. The contract required MM and JMO to pay monthly at least 50% of their salary and 60% of their income tax return.

Overt Acts

46. In furtherance of the conspiracy and to effect its objects, defendant JOSEPH LONGANGA OKOKO committed and caused the commission of the following overt acts in the Northern District of Iowa and elsewhere:

47. From September 2018 through about November 2018, defendant JOSEPH LONGANGA OKOKO collected and received payments on the contract.

48. On or about March 31, 2020, defendant OKOKO initiated suit in the Iowa District Court for Black Hawk County against MM and JMO on the contract in the amount of \$34,428.

Introduction—CLL Contract

49. Prior to June 2018, CLL and his family, were selected in the DV lottery. At some time prior to CLL and his family's entry into the United States, CLL and defendants arranged for defendants to pay for CLL and CLL's family to travel to the United States. On or about June 9, 2018, Defendant JOSEPH LONGANGA OKOKO and others known and unknown to the grand jury entered into a contract with CLL and CLL's family in the amount of \$5,490. The contract required CLL and CLL's family to pay monthly at least 50% of their salary and 50% of their income tax return.

Overt Acts

50. In furtherance of the conspiracy and to effect its objects, defendant JOSEPH LONGANGA OKOKO committed and caused the commission of the following overt acts in the Northern District of Iowa and elsewhere:

51. From about August 2018 through about January 2019, Defendant JOSEPH LONGANGA OKOKO collected and received payments on the contract with CLL.

52. On or about August 31, 2020, defendant JOSEPH LONGANGA OKOKO initiated suit in Iowa District Court for Black Hawk County against CLL on a contract in the amount of \$5,490.00.

Introduction

53. Prior to March 12, 2022, KBN, a single male, was selected in the DV lottery. At some time prior to KBN's entry into the United States, KBN and

defendants arranged for defendants to pay for KBN's travel to the United States. From about January 2022 through about present, defendants JOSEPH LONGANGA OKOKO, JOSEPH ONOLENGA OKAMBA, MEDARD LOTAHE ELONGE, and others known and unknown to the grand jury attempted to arrange a fraudulent civil marriage ceremony between KBN and GLK. The fraudulent marriage would be on behalf of GLK so that an I-130 Petition could be filed for GLK to enter the United States. The marriage would occur in the Congo.

54. After on or about February 7, 2022, through about before April 2022, Defendant MEDARD LOTAHE ELONGE has a text communication with KBN as follows:

I plan to ask you to help him, if possible, to facilitate my wife to reunite with me

So, how do I do it?

You are going to register a civil marriage at the town hall of Kinshasa or Kasa-vubu

Si, how do I do it?

You are going to register a civil marriage at the town hall of Kinshasa or Kasa-vubu. It depends on where S[redacted] will direct And take some photos with my wife at ceremonies as well as different circumstances/events Then you will come with these photos and marriage certificate here within less than a year, my wife will be able to join us Once arrived here, in 6 months you will get a divorce!!!

Overt Acts

55. In furtherance of the conspiracy and to effect its objects, defendants MEDARD LOTAHE ELONGE and JOSEPH ONOLENGA OKAMBA committed and caused the commission of the following overt acts in the Northern District of Iowa and elsewhere:

56. Defendant JOSEPH ONOLENGA OKAMBA drafted and entered a contract between himself and KN dated on or about March 12, 2022.

57. After on or about February 7, 2022, and before on or about September 9, 2022, defendant MEDARD LOTAHE ELONGE discussed the fraudulent marriage with KBN, providing advice as to how the fraudulent marriage would allow MEDARD LOTAHE ELONGE to get defendant MEDARD LOTAHE ELONGE's spouse into the United States.

58. On October 10, 2022, defendants JOSEPH ONOLENGA OKAMBA and MEDARD LOTAHE ELONGE caused an I-130 Petition to be submitted in the name of KBN claiming GLK was the spouse of KBN and eligible for family reunification.

59. On or about October 13, 2022, defendants MEDARD LOTAHE ELONGE and JOSEPH ONOLENGA OKAMBA communicated through WhatsApp. The first message included a .jpg attachment of a marriage certificate purporting to show a marriage between KBN and GLK. In the second message, defendant MEDARD LOTAHE ELONGE informs defendant JOSEPH ONOLENGA OKAMBA that the I-130 Petition submitted for GLK had an error in the date of marriage and

recommended that JOSEPH ONOLENGA OKAMBA notify USCIS of the incorrect date.

60. By early, 2024, JOSEPH ONOLENGA OKAMBA and MEDARD LOTAHE ELONGE were aware of an ongoing grand jury investigation in the Northern District of Iowa related to the fraudulent visa scheme. JOSEPH ONOLENGA OKAMBA and MEDARD LOTAHE ELONGE were aware the KBN was subpoenaed to testify before a grand jury in the Northern District of Iowa. On or about March 31, 2024, through on or about April 4, 2024, defendants, JOSEPH ONOLENGA OKAMBA and MEDARD LOTAHE ELONGE, provided KBN, with false and forged documents, specifically, a false marriage certificate to submit to the grand jury as purported proof that the marriage of KBN and GLK was not fraudulent.

Introduction

61. Prior to October 2019, DEM, a single female, was selected in the DV lottery. At some time prior to DEM's entry into the United States, DEM and defendants arranged for defendants to pay for DEM's travel to the United States. From about May 2020 through about present, defendants JOSEPH ONOLENGA OKAMBA, and others known and unknown to the grand jury attempted to arrange a fraudulent civil marriage ceremony between DEM and PLE. The fraudulent marriage would be on behalf of PLE so that an I-130 Petition could be filed for PLE to enter the United States. The marriage would occur in the DRC.

Overt Acts

62. In furtherance of the conspiracy and to effect its objects, defendant JOSEPH ONOLENGA OKAMBA committed and caused the commission of the following overt acts in the Northern District of Iowa and elsewhere:

63. On or about September 7, 2020, Defendant JOSEPH ONOLENGA OKAMBA caused a Petition for Alien Relative I-130, to be submitted to USCIS. This Petition represented it was submitted on behalf of DEM to petition for her alleged spouse, PLE.

64. On or about October 22, 2022, defendant JOSEPH ONOLENGA OKAMBA caused a DS-260 form to be submitted claiming that PLE was married to DEM, to be submitted to DOS.

65. This was all in violation of Title 18, United States Code, Section 371.

Count 2 (False Statement)

66. On or about July 8, 2021, Defendant JOSEPH LONGANGA OKOKO, did willfully and knowingly make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the Department of Homeland Security, a branch of the Government of the United States, by stating on a Form I-485, in the Northern District of Iowa, that defendant JOSEPH LONGANGA OKOKO was asked the following questions:

- a. Question 25: "Have you **EVER** been arrested, cited, charged, or detained for any reason by any law enforcement official (including may

not limited to any US immigration official or any official of the US armed forces or US Coast Guard)?”

- b. Question 26: “Have you **EVER** committed a crime of any kind (even if you were not arrested, cited, charged with, or tried for that crime)?”
- c. Question 27: “Have you **EVER** pled guilty to or been convicted of a crime or offense (even if the violation was subsequently expunged or sealed by a court, or if you were granted a pardon, amnesty, a rehabilitation decree, or other act of clemency)?”
- d. Question 29: “Have you **EVER** been a defendant or the accused in a criminal proceeding (including pre-trial diversion, deferred prosecution, deferred adjudication, or any withheld adjudication)?”

67. Defendant JOSEPH LONGANGA OKOKO answered each question in the negative. Defendant made the above statements to register or adjust status when U.S. Citizenship and Immigration Services was determining whether to grant defendant status. Defendant made the following certification in regard to his above statements:

I certify, under penalty of perjury, that all of the information in my application and any document submitted with it were provided or authorized by me, that I reviewed and understand all of the information contained in, and submitted with, my application and that all of this information is compete, true, and correct.

68. The above statements and representations were false, as defendant JOSEPH LONGANGA OKOKO then and there knew that he had been arrested, cited, charged, and detained by law enforcement officials; that he had committed a crime, that he had been convicted of a crime, and that he had been a defendant and the accused in a criminal proceeding, and was found guilty of a crime.

69. This was in violation of Title 18, United States Code, Section 1001.

Count 3
(Visa Fraud)

70. From about September 23, 2022, through about April 29, 2023, within the Northern District of Iowa and elsewhere, the defendant BIENVENU SAIDO BINYANGI did knowingly use, possess, obtain, and accept a non-immigrant visa; specifically a B1/B2 visa, which defendant BIENVENU SAIDO BINYANGI knew to be procured by fraud, as defendant BIENVENU SAIDO BINYANGI was not single and did not intend to enter the United States for temporary business or pleasure but rather to re-unite with his spouse and family in the Northern District of Iowa.

71. This was in violation of Title 18, United State Code, Section 1546(a).

Count 4
(Aiding and Abetting Visa Fraud)

72. From about May 24, 2021, through about December 15, 2022, within the Northern District of Iowa and elsewhere, the defendant JOSEPH ONOLENGA OKAMBA did knowingly aid and abet the using, possessing, obtaining, accepting, and receiving an immigrant visa; in the name of MPO, which the defendant JOSEPH ONOLENGA OKAMBA knew to be procured by fraud, false claim and

statement, and otherwise procured by fraud and unlawfully obtained in that defendant JOSEPH ONOLENGA OKAMBA represented that MPO, a/k/a HBD, was his biological mother when he knew that MPO, a/k/a HBD, was not his biological mother.

73. This was in violation of Title 18, United State Code, Section 2 and 1546(a).

Count 5
(False Statement)

74. On or about June 6, 2023, Defendant JOSEPH ONOLENGA OKAMBA did willfully and knowingly make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the Department of State, a branch of the Government of the United States, by stating to investigators with Department of State, in the Northern District of Iowa, that MPO, a/k/a HBD, was his “biological mother.” Defendant JOSEPH ONOLENGA OKAMBA made the statement when Department of State investigators were attempting to determine whether MPO a/k/a HBD was in the United States illegally. This statement and representation was false, because as defendant JOSEPH ONOLENGA OKAMBA then and there knew, MPO a/k/a HBD was not his biological mother.

75. This was in violation of Title 18, United States Code, Section 1001.

Count 6
(Aiding and Abetting Marriage Fraud)

76. From about August 2022, to present, in the Northern District of Iowa, the defendant, JOSEPH ONOLENGA OKAMBA and MEDARD LOTACHE ELONGE did knowingly and unlawfully aid and abet the entry into marriage of GLK and KBN, for the purpose of evading a provision of the immigration laws of the United States and seeking to obtain lawful immigration status in the United States.

77. This was in violation of Title 8, United States Code, 1325(c) and Title 18, United States Code, Section 2.

Count 7
(Aiding and Abetting Marriage Fraud)

78. From about May 2020, to August 2022, in the Northern District of Iowa, the defendant, JOSEPH ONOLENGA OKAMBA did knowingly and unlawfully aid and abet the entry into marriage of DM and PLE, for the purpose of evading a provision of the immigration laws of the United States and seeking to obtain lawful immigration status in the United States.

79. This was in violation of Title 8, United States Code, 1325(c) and Title 18, United States Code, Section 2.

COUNT 8
(Obstruction of Justice)

80. From on or about March 31, 2024, through on or about April 4, 2024, in the Northern District of Iowa, defendants, JOSEPH ONOLENGA OKAMBA and MEDARD LOTACHE ELONGE, did knowingly and intentionally and corruptly influence, obstruct, and endeavor to obstruct and impede the due administration of

justice in *United States v. JOSEPH OKOKO, JOSEPH OKAMBA et al*, in the United States District Court for the Northern District of Iowa, by providing a witness, KBN, false and forged documents that were material to a federal criminal investigation and prosecution, to wit: defendants JOSEPH ONOLENGA OKAMBA and MEDARD LOTAHE ELONGE provided the witness a false marriage certificate to submit to the grand jury to conceal information defendants JOSEPH ONOLENGA OKAMBA and MEDARD LOTAHE ELONGE knew was material to the government's investigation and prosecution regarding *United States v. Joseph OKOKO, et al*.

81. This was in violation of Title 18, United States Code, Section 1503.

Count 9
(Visa Fraud)

82. From on or about November 2021, through on or about September 2022, within the Northern District of Iowa and elsewhere, the defendant MEDARD LOTAHE ELONGE did knowingly use, possess, obtain, accept and immigrant visa; specifically, an F1 student visa, which the defendant MEDARD LOTAHE ELONGE knew to be procured by fraud, as defendant MEDARD LOTAHE ELONGE did not intend to be a student in the United States.

83. This was in violation of Title 18, United State Code, Section 1546(a).

Count 10
(Aiding and Abetting Marriage Fraud)

84. From about July 2017, through the end of 2020, in the Northern District of Iowa and elsewhere, the defendant, JOSEPH LONGANGA OKOKO, did knowingly and unlawfully aid and abet the entry into marriage of RM and EM, for

the purpose of evading a provision of the immigration laws of the United States and seeking to obtain lawful immigration status in the United States.

85. This is in violation of Title 8, United States Code, 1325(c) and Title 18, United States Code, Section 2.

A TRUE BILL


Grand Jury Foreperson

11/4/2024
Date

TIMOTHY T. DUAX
United States Attorney

By: Matthew J. Cole

MATTHEW J. COLE
NICOLE L. NAGIN
Assistant United States Attorneys

PRESENTED IN OPEN COURT
BY THE
FOREMAN OF THE GRAND JURY

And filed 11/6/2024
PAUL DE YOUNG, CLERK